

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JESSICA MURCH, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

QUEST HEALTH SOLUTIONS, LLC, *et al.*,

Defendants.

Case No. 24-cv-05478-GAW

**DECLARATION OF RHIANNON SULLIVAN**

I, Rhiannon Sullivan, hereby declare as follows:

1. I am an employee of Quest Health Solutions, LLC (“Quest”) and I am over 18 years old. My title is VP of Strategy.
2. I have reviewed the “Declaration of Jessica Murch” that Plaintiff filed in opposition to Quest’s motion to dismiss for lack of personal jurisdiction.
3. Quest is in possession of a recording of the phone call that Quest received on October 2, 2024, from the area code 215 phone number that I understand Plaintiff’s counsel has represented is Plaintiff’s phone number. I have listened to that recording.
4. At no point during that phone call did the Quest representative ask the other person on the call whether she was from Pennsylvania. At no point during that phone call did the Quest representative ask the person what the weather was like in Pennsylvania.
5. At no point during that phone call did the Quest Health representative say anything to suggest that she knew that the person on the call was from Pennsylvania or that she knew that person had a Pennsylvania area code.

6. I have also listened to a recording of what I understand is a phone call that took place on October 2, 2024, between a representative of Happy Quote and the area code 215 phone number that I understand Plaintiff's counsel has represented is Plaintiff's phone number.

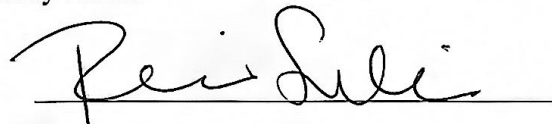
7. On the recording of that call, the Happy Quote representative can be heard asking the other person on the call for her zip code. It is only after the person on the call provided her zip code to the Happy Quote representative that the representative asked whether the person was from Pennsylvania. The Happy Quote representative also asked the person how the weather was in Pennsylvania.

8. Based on the foregoing, the statements in the Declaration of Jessica Murch that the Quest representative asked if the other person was from Pennsylvania, and asked her how the weather was in Pennsylvania, are incorrect. The recording of the call involving the Quest representative makes no mention of Pennsylvania.

9. Paragraph 19 of the Declaration of Jessica Murch states that Quest has two sales employees in Pennsylvania, Kevin Withers and Madison Dew. Both Mr. Withers and Ms. Dew started their employment with Quest after October 2, 2024, the date of the phone calls referenced in Ms. Murch's Declaration. Mr. Withers's employment with Quest began on November 4, 2024, and Ms. Dew's employment with Quest began on February 17, 2025.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 1<sup>st</sup> day of May 2025.

A handwritten signature in black ink, appearing to read "Reia Suli", is written over a horizontal line.